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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
SOUTHERN CALIFORNIA,
Plaintiff,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT,
et al.,

Defendants.

Case No. 2:22-CV-04760-SHK

**PLAINTIFF'S STATUS REPORT
RE COURT'S ORDER ON
PARTIES' CROSS MOTIONS FOR
SUMMARY JUDGMENT [DKT. 87]**

Honorable Shashi H. Kewalramani
United States Magistrate Judge

EUNICE CHO (*pro hac vice*)

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ACLU of Southern California v. U.S. ICE, et al.,

Case No. 2:22-CV-04760-SHK

STATUS REPORT

1 In accordance with the Court's Summary Judgment Order, ECF No. 87, counsel
2 for Plaintiff and Defendants met on July 26, 2024, to meet and confer regarding
3 Defendants' production of previously withheld records, and Defendants' search for
4 documents related to a letter and resulting case report regarding Mr. Vargas Arellano
5 sent by legal service providers representing detained immigrants as part of the
6 National Qualified Representative Program (NQRP), which requested investigation
7 by the DHS Office of Civil Rights and Civil Liberties (CRCL).

8 Documents Subject to Exemptions 6 and 7(c)

9 During the call, the Parties agreed that by August 26, 2024, Defendants would
10 produce documents withheld subject to Exemptions 6 and 7(c) and not subject to the
11 Defendants' Ex Parte Motion at ECF No. 88.

12 Plaintiff also proposed that absent a court order to the contrary, Defendants would
13 produce all documents withheld under Exemptions 6 and 7(c) by August 26, 2024.

14 Search for Additional Records

15 With respect to Defendants' search of documents related to the NQRP letter for
16 Mr. Vargas Arrellano's death, and the request to CRCL, Plaintiff suggested the
17 following proposal:

- 18 • Regarding OIG, on July 26, 2024 Defendants proposed search parameters
19 (search terms, locations and timeframe) for a further search of its records, and
20 on July 31, 2024, Plaintiff provided a counter-proposal for search parameters.
- 21 • Regarding CRCL, on July 31, 2024 Plaintiff also provided Defendants
22 proposed search parameters for its search.

23 Plaintiff has asked that OIG and CRCL provide Plaintiff hit counts in response to its
24 proposed parameters by August 8, 2024, that the Parties meet and confer by August
25 14, 2024 to finalize the search parameters, and that Defendants would produce all
26 responsive documents by October 31, 2024.

In response to Plaintiff's proposals, Counsel for Defendants informed Plaintiff that they have passed along Plaintiff's proposals to Defendants and will reply shortly.

Respectfully submitted this 2d of August, 2024.

/S/

Laboni Hoq

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